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*Proposed Counsel for the Official Committee
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case.
No. 19-30088 (DM)*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF THOMAS R. KRELLER
IN SUPPORT OF APPLICATION OF THE
OFFICIAL COMMITTEE OF UNSECURED
CREDITORS PURSUANT TO 11 U.S.C.
§§ 328(a) AND 1103(a) AND FED. R.
BANK. P. 2014 AND 2016 FOR AUTHORITY
TO RETAIN AND EMPLOY MILBANK LLP
AS COUNSEL, EFFECTIVE AS OF
FEBRUARY 12, 2019**

Date: April 24, 2019; Time: 9:30 AM PT
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, **THOMAS R. KRELLER**, being duly sworn, state the following under the penalty of
2 perjury:

3 1. I am an attorney admitted to practice in the State of California and I am a partner
4 in the Financial Restructuring Group of the firm Milbank LLP ("Milbank"), proposed counsel to
5 the Official Committee of Unsecured Creditors (the "Committee") of the above-captioned debtors
6 and debtors in possession (collectively, the "Debtors"). Milbank maintains an office at, among
7 other places, 2029 Century Park East, 33rd Floor, Los Angeles, California, 90067-3019. There are
8 no disciplinary proceedings pending against me.

10 2. I am duly authorized to make this declaration (the "Declaration") on behalf of
11 Milbank in support of the *Application of the Official Committee of Unsecured Creditors Pursuant*
12 *to 11 U.S.C. §§ 328(a) and 1103(a) and Fed. R. Bank. R. 2014 and 2016 for Authority to Retain*
13 *and Employ Milbank LLP as Counsel, Effective as of February 12, 2019*, dated April 3, 2019 (the
14 "Application"),¹ seeking authorization to retain Milbank as counsel to the Committee under the
15 terms and conditions set forth in the Application and herein. I submit this Declaration in
16 accordance with Bankruptcy Code sections 328(a) and 1103(b) and Bankruptcy Rules 2014, 2016
17 and 5002.

19 3. Except as otherwise noted, I have personal knowledge of the matters set forth herein
20 and, if called as a witness, I would testify thereto. Certain of the disclosures set forth herein relate
21 to matters not within my personal knowledge, but rather within the personal knowledge of other
22 attorneys and employees at Milbank who have acted at my direction and under my supervision,
23 and are based on information provided by them to me based upon their review of Milbank's
24 internal records as maintained in the ordinary course of business.

26
27
28 ¹ Capitalized terms used but not otherwise defined herein have the meaning ascribed to them in
the Application.

4. On January 29, 2019, each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. See Docket No. 1. On January 31, 2019, the Court entered an order consolidating the Debtors' cases for joint administration. See Docket No. 207.

QUALIFICATIONS OF MILBANK

7. Importantly, Milbank served as counsel to the official committee of unsecured creditors in the bankruptcy cases PG&E commenced in 2001. See In re Pacific Gas & Electric Co., Case No. 01-30923 (Bankr. N.D. Cal.). In addition, Milbank has significant experience in representing creditors' committees in numerous other large, complex chapter 11 cases and other financial and operational restructuring scenarios. Milbank's other notable representations include,

² Western Asset Management Company, LLC has resigned from the Committee.

1 among others: In re FirstEnergy Solutions, Corp., Case No. 18-50757 (AMK) (Bankr. N.D. Ohio);
2 In re TK Holdings Inc., Case No. 17-11375 (BLS) (Bankr. D. Del.); In re M & G USA Corp., Case
3 No. 17-12307 (BLS) (Bankr. D. Del.); In re Breitburn Energy Partners LP, Case No. 16-11390
4 (SMB) (Bankr. S.D.N.Y.); In re Alpha Natural Resources, Inc., Case No. 15-33896 (KRH) (Bankr.
5 E.D. Va.); In re Arcapita Bank B.S.C.(c), Case No. 12-11076 (SHL) (Bankr. S.D.N.Y.); In re
6 Eastman Kodak Co., Case No. 12-10202 (ALG) (Bankr. S.D.N.Y.); In re ATP Oil & Gas
7 Corporation, Case No. 12-36187 (MI) (Bankr. S.D. Tex.); In re The Great Atlantic & Pacific Tea
8 Company, Inc., Case No. 10-24549 (RDD) (Bankr. S.D.N.Y.); In re Local Insight Media Holdings,
9 Inc., Case No 10-13677 (KG) (Bankr. D. Del.); In re Idearc Inc., Case No. 09-31828 (BJH) (Bankr.
10 N.D. Tex.); In re Sea Launch Company, L.L.C., Case No. 09-12153 (BLS) (Bankr. D. Del.); In re
11 Charys Holding Company, Inc., Case No. 08-10289 (BLS) (Bankr. D. Del.); In re Lehman
12 Brothers Holdings Inc., Case No. 08-13555 (JMP) (Bankr. S.D.N.Y.); In re VI Acquisition Corp.,
13 Case No. 08-10623 (KG) (Bankr. D. Del.); In re Anvil Knitwear, Inc., Case No. 06-12345 (ALG)
14 (Bankr. S.D.N.Y.); In re Winn-Dixie Stores, Inc., Case No. 05-03817 (JAF) (Bankr. M.D. Fla.);
15 In re Refco Inc., Case No. 05-60006 (RDD) (Bankr. S.D.N.Y.); In re Internet Corp., Case No. 04-
16 67597 (MBM) (Bankr. E.D. Mich.); In re RCN Corporation, Case No. 04-13638 (RDD) (Bankr.
17 S.D.N.Y.); In re Maxxim Medical Group, Inc., Case No. 03-10438 (PJW) (Bankr. D. Del.); In re
18 Fleming Companies, Inc., Case No. 03-10945 (MFW) (Bankr. D. Del.); In re Enron Corp., Case
19 No. 01-16034 (AJG) (Bankr. S.D.N.Y.); and In re Safety-Kleen Corp., Case No. 00-2303 (PJW)
20 (Bankr. D. Del.).
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23

24 8. In addition, Milbank is recognized as one of the premier global legal advisors to
25 the power generation industry, including leading roles in complex financing and restructuring
26 transactions, as well as representing various creditor constituencies and other parties-in-interest in
27 many of the industry's significant chapter 11 cases. Such experience and know-how will enable
28

1 the Committee to react more quickly and to function more efficiently and effectively in these
2 chapter 11 cases.

3 **SERVICES TO BE RENDERED**

4 1. The Committee has requested that Milbank render the following services, among
5 others, in connection with these chapter 11 cases:

- 6
- 7 a. participate in in-person and telephonic meetings of the Committee and
8 subcommittees formed thereby, and otherwise advise the Committee with
9 respect to its rights, powers and duties in these chapter 11 cases;
- 10 b. assist and advise the Committee in its meetings and negotiations with the
11 Debtors and other parties in interest regarding the administration of these
12 chapter 11 cases;
- 13 c. represent the Committee at hearings and other proceedings before the Court
14 and such other courts or tribunals, as appropriate;
- 15 d. assist the Committee in its analysis of, and negotiations with the Debtors or
16 third parties related to, financing, asset disposition transactions,
17 compromises of controversies, and assumption and rejection of executory
18 contracts and unexpired leases;
- 19 e. assist the Committee in its analysis of, and negotiations with the Debtors or
20 third parties related to, the formulation, confirmation and implementation
21 of a chapter 11 plan(s) and all documentation related thereto;
- 22 f. assist the Committee in analyzing claims asserted against, and interests in,
23 the Debtors, and in negotiating with the holders of such claims and interests
24 and bringing, or participating in, objections or estimation proceedings with
25 respect to such claims and interests;
- 26 g. assist with the Committee's review of the Debtors' Schedules of Assets and
27 Liabilities, Statements of Financial Affairs and other financial reports
28 prepared by the Debtors, and the Committee's investigation of the acts,
conduct, assets, liabilities and financial condition of the Debtors and of the
historic and ongoing operation of their businesses;
- h. assist and advise the Committee with respect to its communications with the
general creditor body regarding significant matters in these cases;
- i. respond to inquiries from individual creditors as to the status of, and
developments in, these chapter 11 cases;

- 1 j. review and analyze complaints, motions, applications, orders and other
2 pleadings filed with the Court, and advise the Committee with respect to its
3 positions thereon and the filing of any responses thereto;
- 4 k. assist the Committee in its review and analysis of, and negotiations with the
5 Debtors and non-Debtor affiliates related to, intercompany transactions and
6 claims;
- 7 l. review and analyze third party analyses or reports prepared in connection
8 with potential claims of the Debtors, advise the Committee with respect to
9 its positions thereon, and perform such other diligence and independent
10 analysis as may be requested by the Committee;
- 11 m. provide the Committee with advice relating to applicable federal and state
12 regulatory issues, including with respect to matters related to the Federal
13 Energy Regulatory Commission, California Public Utilities Commission
14 and the Nuclear Regulatory Commission, as such issues may arise in these
15 chapter 11 cases;
- 16 n. assist the Committee in preparing pleadings and applications, and pursuing
17 or participating in adversary proceedings, contested matters and
18 administrative proceedings as may be necessary or appropriate in
19 furtherance of the Committee's duties, interests, and objectives; and
- 20 o. perform such other legal services as may be necessary or as may be
21 requested by the Committee in accordance with the Committee's powers
22 and duties as set forth in the Bankruptcy Code.

23 9. Subject to the Court's approval of the Application, Milbank is willing to serve as
24 the Committee's counsel and to perform the services described above. I anticipate that the
25 Committee may, from time to time, request that Milbank undertake specific matters beyond the
26 scope of the responsibilities set forth above and that Milbank may, in its discretion, undertake any
27 such specific matters.

28 10. Milbank expects to work cooperatively with other professionals retained by the
Committee in these cases in allocating responsibility for various tasks in order to avoid duplication
of effort and to move these cases forward as quickly, harmoniously and efficiently as possible.

MILBANK'S DISINTERESTEDNESS

11. Milbank does not represent and will not represent any entity, other than the
Committee, in matters related to these chapter 11 cases.

1 12. To the best of my knowledge and, except as otherwise set forth in this Declaration,
2 the partners, counsel, associates and employees of Milbank do not have any connection with the
3 Debtors, their known creditors, other known or potential parties in interest, their respective
4 attorneys or accountants or other professionals, the U.S. Trustee or any person employed in the
5 office of the U.S. Trustee, any United States Bankruptcy Judge or District Judge for the Northern
6 District of California, the Clerk of the Bankruptcy Court for the Northern District of California, or
7 any person employed by the office of such Clerk.
8

9 13. In connection with its proposed retention by the Committee, Milbank searched its
10 client database to determine whether it had any relationships with (i) any party listed on the
11 Debtors' list of potential parties in interest (the "Debtors Interested Party List"),³ which is
12 summarized on Exhibit 1 (the "Retention Checklist") to the *Declaration of Stephen Karotkin in*
13 *Support of Application of Debtors Pursuant to 11 U.S.C. § 327(a) and Fed. R. Bankr. P. 2014(a)*
14 *and 2016 for Authority to Retain and Employ Weil, Gotshal & Manges LLP as Attorneys for the*
15 *Debtors Effective as of the Petition Date* [Docket No. 865]; and (ii) all other known or potential
16 parties in interest based upon information provided to Milbank by the Debtors or that was
17 otherwise publicly available. The Retention Checklist is attached hereto as **Annex 1** and
18 incorporated herein by reference.
19
20

21 14. To the extent that Milbank's searches of its client database indicated that Milbank
22 (or any of its partners or employees) has or had a relationship with any of the identified entities
23 within the last three years, the identity of such entity, and Milbank's relationship therewith, are set
24 forth on **Annex 2** attached hereto and incorporated herein.
25

26
27 ³ Milbank did not perform any independent diligence with respect to the accuracy of the
28 Debtors' Interested Party List. The Interested Party List also contained a number of generic
names or terms (such as "Alpha" or "Tiger") that by themselves cannot be searched through
Milbank's conflict database with any definitiveness or accuracy. As such, Milbank has
excluded any related hits from its disclosures herein.

1 15. Of the entities listed on Annex 2, no single entity accounted for more than 1.5% of
2 Milbank's gross revenues for the years ending December 31, 2017 or December 31, 2018 other
3 than: Apollo, Blue Mountain Capital, Credit Suisse, Deutsche Bank, Goldman Sachs and JP
4 Morgan (including their respective subsidiaries and affiliates), none of whom individually
5 accounted for more than 4.75% of Milbank's gross revenue. Except as set forth herein, Milbank
6 has not represented any of the entities listed on Annex 2 in connection with any matters relating to
7 the Debtors and does not, and will not, represent them in any capacity in connection with these
8 chapter 11 cases. To the extent the Committee elects to commence litigation directly against any
9 of these entities, the Committee will be advised by such other counsel the Committee may select
10 to represent it in such litigation, as is customary in large, complex chapter 11 cases.
11

12 16. A conflicts search was also conducted with respect to all members of the
13 Committee. To the extent that such searches indicated that Milbank has or had a relationship with
14 any such entity within the last three years, the identity of such entity, and Milbank's relationship
15 therewith, is also set forth on Annex 2 attached hereto.
16

17 17. From time to time, Milbank interacts with certain of the professional firms that have
18 been or are proposed to be employed by the Debtors or other parties in interest in these cases.
19 Except as may be set forth on Annex 2 attached hereto, to the best of my knowledge, Milbank has
20 not represented any of such professional firms during the three-year period prior to the date hereof.
21 Certain of the financial advisors and investment bankers who are or are proposed to be retained in
22 these cases have been retained by Milbank or Milbank's clients in connection with unrelated
23 matters.
24

25 18. In addition to the disclosures in Annex 2, Milbank has certain additional matters
26 worthy of disclosure below.
27

28 19. With respect to certain Milbank attorneys:

- 1 (a) the spouse of a current Milbank attorney working on these chapter 11 cases is
2 employed as Deputy Attorney General in the Natural Resources Law Section of the
3 Office of the California Attorney General and is not currently engaged in any
4 matters related to these chapter 11 cases.
- 5 (b) The father of a current Milbank associate is a partner in the New York office of
6 Akin Gump Strauss Hauer & Feld LLP, which represents an *ad hoc* group of the
7 Debtors' bondholders. Milbank will institute formal measures to screen the
8 associate from all aspects of Milbank's representation of the Committee.
- 9 (c) The brother of a current Milbank attorney is a partner at Elliott Management
10 Corporation ("Elliott"). Upon information and belief, Elliott is a member of an *ad*
11 *hoc* group of the Debtors' bondholders. Milbank will institute formal measures to
12 screen the associate from all aspects of Milbank's representation of the Committee.

13 20. Milbank represents a number of investors in or lenders to entities that directly or
14 indirectly own or manage properties or projects that may have power purchase agreements or other
15 contractual arrangements with the Debtors or their affiliates. In those instances, Milbank's clients
16 generally do not have claims against or contractual privity with the Debtors but are financing
17 sources for parties that may.

18 21. In January 2019, Milbank was approached by and selected to represent an *ad hoc*
19 group of the Debtors' bondholders to review certain public documents related to the Debtors' debt
20 or other securities, in anticipation of the Debtors' ultimate chapter 11 filings and to review the
21 Debtors' first day filing once the cases were commenced. Milbank appeared on behalf of the *ad*
22 *hoc* group at the first day hearing in these chapter 11 cases for the limited purpose of voicing
23 support for many of the Debtors' customary first day motions. The proposed engagement was
24 terminated shortly after the Petition Date, and the *ad hoc* group is now represented in these cases
25 by Akin Gump Strauss Hauer & Feld LLP.

26 22. Milbank represents Atrium Holding Company, the owner of the Hilton Sonoma
27 Wine Country Hotel located in Santa Rosa, California. The hotel was destroyed by the Tubbs Fire
28 in October 2017. Milbank represents Atrium Holding Company solely in connection with a
potential dispute with an insurance group regarding insurance coverage for the hotel.

1 23. Milbank formerly represented The Vanguard Group in connection with its review
2 of certain documents related to the Debtors' debt or other securities. This representation was
3 terminated in early January of 2019.

4 24. Aside from the representations described above, to the best of my knowledge,
5 during the three-year period prior to the date hereof, Milbank did not represent any other parties
6 with connections to the Debtors.

7
8 25. Milbank also made a general inquiry of all partners and employees of the firm
9 requesting disclosure of any relationship with: (a) any Bankruptcy Judge or District Judge for the
10 Northern District of California; (b) anyone employed by the Office of the Clerk of the Bankruptcy
11 Court for the Northern District of California; or (c) any trustee, attorney or staff in the offices of
12 the U.S. Trustee. Additionally, Milbank requested disclosure by all partners and employees, to
13 the best of their knowledge, of any claims held against, or equity interest in, any of the Debtors or
14 their non-Debtor affiliates and whether any Milbank employee is or was a director, officer or
15 general partner of the Debtors or a relative of a director, officer or general partner of the Debtors.
16 To the best of my knowledge, no attorney or employee at the firm is related to any United States
17 Bankruptcy Judge or District Court Judge for the Northern District of California or to the United
18 States Trustee for such district or to any employee in the office thereof. The proposed employment
19 of Milbank is not prohibited by or improper under Bankruptcy Rule 5002.
20

21
22 26. The Debtors have numerous relationships and creditors. Consequently, although
23 every reasonable effort has been made to discover and eliminate the possibility of any connection
24 or conflict, including the efforts outlined above, Milbank is unable to state with certainty which of
25 its clients or such clients' affiliates hold claims or otherwise are parties in interest in these cases.
26 Milbank: (i) is carrying on further inquiries of its partners, counsel and associates with respect to
27 the matters contained herein, and (ii) will continue monitoring its database with respect to any new
28

1 clients. If Milbank discovers any information that is contrary or pertinent to the statements made
2 herein, Milbank will promptly disclose such information to the Court on notice to such creditors,
3 the U.S. Trustee, and such other creditors or other parties in interest as may be required under
4 noticing procedures applicable in these cases.

5 **PROFESSIONAL COMPENSATION**

6
7 27. As of the date of this Declaration, Milbank has received no compensation for its
8 work on behalf of the Committee.

9 28. Subject to the Court's approval and in accordance with the Application, Milbank
10 will seek to be compensated for its services to the Committee at its standard hourly rates, which
11 are based on each Milbank professional's level of experience. At present, the standard hourly rates
12 charged by Milbank range from \$1,155 to \$1,540 for partners, \$1,120 to \$1,315 for counsel, \$450
13 to \$1,080 for associates and senior attorneys, and \$220 to \$360 for legal assistants. These hourly
14 rates are subject to periodic firm-wide adjustments in the ordinary course of Milbank's business,
15 notice of which will be provided to the Committee, the Debtors, and the U.S. Trustee.

16
17 29. The hourly rates set forth herein are the firm's standard hourly rates for work of
18 this nature. These rates are set at a competitive level designed to compensate Milbank for the work
19 of its attorneys and legal assistants and to cover fixed and routine overhead expenses. It is the
20 firm's policy to charge its clients for all disbursements and expenses incurred in the rendering of
21 services. These disbursements and expenses include, among other things, costs for telephone and
22 facsimile charges, photocopying, travel, business meals, computerized research, messengers,
23 couriers, postage, witness fees and other fees related to trials and hearings.

24
25 30. Milbank intends to apply to the Court for payment of compensation and
26 reimbursement of expenses incurred as counsel to the Committee in accordance with applicable
27 provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, the
28

1 Revised UST Guidelines, the Guidelines for Compensation, the Interim Compensation Order and
2 any additional procedures that may be or have already been established by the Court in these cases.
3 Milbank will maintain detailed, contemporaneous records of the time expended by its attorneys
4 and paraprofessionals rendering legal services to the Committee and of any necessary costs and
5 expenses incurred in connection therewith. Milbank expects to be reimbursed for such costs and
6 expenses, as provided in the Revised UST Guidelines and the Guidelines for Compensation.
7

8 31. Other than as set forth above, there is no proposed arrangement between the
9 Committee and Milbank for compensation to be paid in these cases. Milbank has no agreement
10 with any other entity to share any compensation received, nor will any be made, except as
11 permitted under section 504(b)(1) of the Bankruptcy Code.
12

13 **STATEMENT REGARDING U.S. TRUSTEE GUIDELINES**

14 32. The following information is provided in response to the request for additional
15 information set forth in Paragraph D.1. of the Revised UST Guidelines:

16 **Question:** Did you agree to any variations from, or alternatives to, your
17 standard or customary billing arrangements for this engagement?

18 **Response:** No.

19 **Question:** Do any of the professionals included in this engagement vary their
20 rate based on the geographic location of the bankruptcy case?

21 **Response:** No.

22 **Question:** If you represented the client in the twelve months prepetition,
23 disclose your billing rates and material financial terms for the
24 prepetition engagement, including any adjustments during
25 the twelve months prepetition. If your billing rates and material
26 financial terms have changed postpetition, explain the difference and
27 the reasons for the difference.

28 **Response:** Milbank did not represent the Committee prior to the
commencement of these chapter 11 cases.

Question: Has your client approved your prospective budget and staffing plan,
and, if so for what budget period?

Response: Milbank is in the process of developing a prospective budget and staffing plan for the Committee’s review and approval. Furthermore, Milbank understands that the Committee, along with the Debtors and the U.S. Trustee, will maintain active oversight of Milbank’s billing practices.

33. Milbank will use reasonable efforts to comply with the Revised UST Guidelines.

34. The foregoing constitutes the statement of Milbank pursuant to Bankruptcy Code section 1103(b) and Bankruptcy Rule 2014(a).

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on April 3, 2019, Los Angeles, CA

/s/ Thomas R. Kreller
Thomas R. Kreller

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ANNEX 1
Retention Checklist

- Debtors
- Debtors' Trade Names and Aliases (up to 8 years)
- Affiliates and Subsidiaries
- Bank Accounts
- Bankruptcy Judges & Staff Northern District of California
- Current Officers and Directors
- Term and Revolving Loan Lenders and Administrative Agents
- Contract Counterparties
- DIP Lenders
- Debtors Professionals
- Former Officers and Directors (since 2008)
- Affiliations of Former Officers
- Affiliations of Former Directors
- Insurance/Insurance Provider/Surety Bonds
- Surety Bonds
- Landlords and parties to leases
- Lenders Litigation Counterparties/Litigation Pending Lawsuits
- Litigation Parties (in adversary proceeding 19-03003)
- Ad Hoc Committee of Unsecured Tort Claimant Creditors
- Non-Debtors Professionals
- Ordinary Course Professionals
- Letters of Credit
- Regulatory and Government
- Significant Competitors
- Significant Shareholders (more than 5% of equity)
- Significant holder of voting securities
- Taxing Authorities
- Top Unsecured Creditors (top 50 list as well as other large holders of unsecured claims)
- Unsecured Notes
- UCC Lien Holders
- Unions
- Office of the United States Trustee for Region 17
- Utility Providers
- Vendors/Suppliers
- Interested Parties / Notice of Appearance Parties

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ANNEX 2
Connections to Potential Parties in Interest

Party Name	Relationship to the Debtors¹	Relationship to Milbank²
8minutenergy Renewables, LLC	Contract Counterparties	Current client on matter unrelated to the Debtors or the Chapter 11 cases
ABM Building Solutions, L.L.C.	Affiliates of Former Directors	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
ADP, Inc.	Vendors	Current client on matter unrelated to the Debtors or the Chapter 11 cases
AIG Europe Limited	Litigation Counterparties / Litigation Pending Lawsuits	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
AIG Property Casualty Company	Litigation Counterparties / Litigation Pending Lawsuits	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Air Products Manuf. Corp.	Contract Counterparties	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Allianz Global Corporate & Specialty SE (PDW)	Insurance/Insurance Provider/Surety Bonds	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Allianz Global Risks	Insurance/Insurance Provider/Surety Bonds	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Allianz Global Risks US Insurance Company	Insurance/Insurance Provider/Surety Bonds;	Potential affiliate of current client on matter unrelated to

¹ The Relationship to the Debtors is correlated to the categories of relationships from the Debtors' Interested Party List. Where a Party was listed in multiple categories, each category is indicated.

² A "current client" is an entity for which there are, as of the date hereof, active matters on which Milbank is engaged; a "former client" is an entity for which there were no active matters as of the date hereof. Use of the word "potential" signifies entities for which Milbank was unable to determine whether the similarities of names was a coincidence or whether the party in interest is related to a client in Milbank's databases. Milbank does not represent any of these "current" or potential" clients in matters related to the Debtors or the Chapter 11 cases. Identification of a party in interest on Annex 2 is not an admission of a conflict, disabling or otherwise, but rather is solely a disclosure of potential connections.

	Litigation Counterparties / Litigation Pending Lawsuits	the Debtors or the Chapter 11 cases
AltaGas Ripon Energy Inc.	Contract Counterparties	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
AltaGas San Joaquin Energy Inc.	Contract Counterparties	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
American International Reinsurance Company Ltd	Insurance/Insurance Provider/Surety Bonds	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Apollo Global Management, LLC	Party Listed on Filed 2019 Statement	Current client on matter unrelated to the Debtors or the Chapter 11 cases
ATC Group Services	Vendors	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Atlantica Yield ³	Contract Counterparties; Interested Parties/NOA Parties	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Bank of America ⁴	Bank Accounts; Term and Revolving Loan Lenders and Administrative Agents; Lenders; DIP Lenders; Unsecured Notes; Top Unsecured Creditors; Unsecured Notes; Interested Parties/NOA Parties	Current client on matter unrelated to the Debtors or these Chapter 11 cases
Bank of Montreal	Contract Counterparties	Current client on matter unrelated to the Debtors or the Chapter 11 cases

³ Milbank believes that Atlantic Yield is also referred to in the Debtors' Interested Party List as "Atlantica Yield" and "Atlantica Yield plc, Mojave Solar LLC."

⁴ Milbank believes that Bank of America is also referred to in the Debtors' Interested Party List as "Bank of America, N.A.", "Bank of America Merrill Lynch", "Merrill Lynch" and "Merrill Lynch, Pierce, Fenner & Smith Incorporated."

The Bank of New York Mellon ⁵	Bank Accounts; Term and Revolving Loan Lenders and Administrative Agents; Top Unsecured Creditors; Unsecured Notes	Current client on matter unrelated to the Debtors or these Chapter 11 cases
The Bank of Tokyo-Mitsubishi UFJ, Ltd. (TL)	Term and Revolving Loan Lenders and Administrative Agents; Unsecured Notes	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Barclays Bank PLC ⁶	Contract Counterparties; Lenders; DIP Lenders; Unsecured Notes; Term and Revolving Loan Lenders and Administrative Agents	Current client on matter unrelated to the Debtors or these Chapter 11 cases
Barclays Capital Inc.	Bank Accounts; Unsecured Notes	Current client on matter unrelated to the Debtors or these Chapter 11 cases
Barclays Global	Unsecured Notes	Current client on matter unrelated to the Debtors or these Chapter 11 cases
The Baupost Group, LLC	Interested Parties/NOA Parties; Party Listed on Filed 2019 Statement	Current client on matter unrelated to the Debtors or these Chapter 11 cases
The Baupost Group SSgA Funds Management	Significant Holder of Voting Securities; Party Listed on Filed 2019 Statement	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
BBH Financial Services	UCC Lien Holders	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
BlackRock, Inc.	Significant Shareholders (more than 5% of equity)	Current client on matter unrelated to the Debtors or these Chapter 11 cases
BlackRock Fund Advisors	Significant holder of voting securities	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases

⁵ Milbank believes that The Bank of New York Mellon is also referred to in the Debtors' Interested Party List as "Bank of New York Mellon," "Mellon Bank Boston" and "The Bank of New York Trust Company."

⁶ Milbank believes that Barclays Bank PLC is also referred to in the Debtors' Interested Party List as "Barclays Global."

Blue Mountain Capital Management LLC	Significant Holder of Voting Securities; Interest Parties/NOA Parties	Current client on matter unrelated to the Debtors or these Chapter 11 cases
BNP Paribas	Bank Accounts; Term and Revolving Loan Lenders and Administrative Agents; Unsecured Notes; Contract Counterparties	Current client on matter unrelated to the Debtors or these Chapter 11 cases
BNP Paribas Securities Corp.	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
BNP Paribas US	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Boart Longyear M&E Drilling Services	Vendors	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
BP Energy Company	Contract Counterparties; Top Unsecured Creditors	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
BP Products North America Inc.	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Brookfield Renewable Energy Partners	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Canadian Imperial Bank of Commerce ⁷	Term and Revolving Loan Lenders and Administrative Agents; Unsecured Notes; Contract Counterparties	Current client on matter unrelated to the Debtors or these Chapter 11 cases
Canon Solutions America, Inc.	UCC Lien Holders	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases

⁷ Milbank believes that Canadian Imperial Bank of Commerce is also referred to in the Debtors' Interested Party List as "Canadian Imperial Bank of Commerce, New York Branch" and "Canadian Imperial Bank of Commerce, NY Agency."

Capital Dynamics, Inc.	Contract Counterparties; Litigation Parties (in adversary); Interested Parties/NOA Parties	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Cardinal Cogen	Contract Counterparties	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
CarVal Investors	Party Listed on Filed 2019 Statement	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Castleton Canada	Contract Counterparties	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Castleton Comm	Contract Counterparties	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Centerbridge Partners LP	Party Listed on Filed 2019 Statement	Current client on matter unrelated to the Debtors or these Chapter 11 cases
CIGNA Group Insurance	Insurance/Insurance Provider/Surety Bonds	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Citadel Advisors LLC	Party Listed on Filed 2019 Statement	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Citibank, N.A. ⁸	Bank Accounts; Term and Revolving Loan Lenders and Administrative Agents; Top Unsecured Creditors; Unsecured Notes; Interested Parties/NOA Parties	Current client on matter unrelated to the Debtors or these Chapter 11 cases
Citigroup Energy Inc.	Contract Counterparties	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Citigroup Global Markets ⁹	Bank Accounts; Lenders; DIP Lenders; Unsecured Notes	Current client on matter unrelated to the Debtors or these Chapter 11 cases

⁸ Milbank believes that Citibank, N.A. is also referred to in the Debtors' Interested Party List as "Citi" and "Citigroup."

⁹ Milbank believes that Citibank Global Markets is also referred to in the Debtors' Interested Party List as "Citibank Global Markets Inc."

Clean Energy	Vendors	Potential current client on matter unrelated to Debtors or the Chapter 11 cases
Copper Mountain Solar 1, LLC	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Copper Mountain Solar 2, LLC	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Cyrus Capital Partners, LP	Party Listed on Filed 2019 Statement	Current client on matter unrelated to the Debtors or the Chapter 11 cases
The Davey Tree Expert Co.	Vendors	Former client on matter unrelated to the Debtors or the Chapter 11 cases
Davidson Kempner Capital Management LP	Party Listed on Filed 2019 Statement	Current client on matter unrelated to the Debtors or the Chapter 11 cases
DB Energy Trading	Contract Counterparties	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
DE Shaw	Contract Counterparties	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Deloitte & Touche LLP	Debtors Professionals	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Deutsche Bank ¹⁰	Unsecured Notes; Top Unsecured Creditor	Current client on matter unrelated to the Debtors or these Chapter 11 cases
Deutsche Bank Trust Company Americas ¹¹	Bank Accounts; Interested Parties/NOA Parties	Current client on matter unrelated to the Debtors or these Chapter 11 cases
Diameter Capital Partners LP	Party Listed on Filed 2019 Statement	Current client on matter unrelated to the Debtors or the Chapter 11 cases

¹⁰ Millbank believes that Deutsche Bank is also referred to in the Debtors' Interested Party List as "Deutsche."

¹¹ Milbank believes that Deutsche Bank Trust Company Americas is also referred to in the Debtors' Interested Party List as "Deutsche Bank National Trust Company."

EDF Renewable Energy	Contract Counterparties	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Elliott Management Corporation ¹²	Significant Holder of Voting Securities; Interested Parties/NOA Parties	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Energy Capital Partners	Contract Counterparties	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Farallon Capital Management LLC	Party Listed on Filed 2019 Statement	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Fidelity Management Trust Company	Bank Accounts	Current client on matter unrelated to the Debtors or these Chapter 11 cases
First Reserve	Contract Counterparties	Current client on matter unrelated to the Debtors or the Chapter 11 cases
First Solar	Contract Counterparties; Litigation Parties (in adversary)	Current client on matter unrelated to the Debtors or the Chapter 11 cases
GE Oil & Gas – North America	Vendors	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
GE Renewable Energy	Vendors	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
General Electric International Inc. ¹³	Vendors	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Goldman Sachs Bank USA	Term and Revolving Loan Lenders and Administrative Agents; Unsecured Notes	Current client on matter unrelated to the Debtors or these Chapter 11 cases

¹² Milbank believes that Elliot Capital Management is also referred to in the Debtors' Interested Party List as "Elliot Management."

¹³ Milbank believes that General Electrical International, which is included in the Debtors' Interested Party List, is likely "General Electric International Inc." and is also referred to as "General Electric International – Power Services," and was run through our conflicts check as such.

Goldman, Sachs & Co. ¹⁴	Bank Accounts	Current client on matter unrelated to the Debtors or these Chapter 11 cases
Google Inc.	Contract Counterparties; Landlords and parties to leases	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Great Lakes Insurance SE	Insurance/Insurance Provider/Surety Bonds	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Great Lakes Insurance SE (Munich)	Insurance/Insurance Provider/Surety Bonds	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Great Lakes Reinsurance (UK) PLC (Munich Re London)	Insurance/Insurance Provider/Surety Bonds	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Great Lakes Reinsurance (UK) S.E.	Insurance/Insurance Provider/Surety Bonds	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Great West Life and Annuity Insurance Company	UCC Lien Holders	Current client on matter unrelated to the Debtors or these Chapter 11 cases
JP Morgan Chase Bank, N.A.	Bank Accounts; Contract Counterparties; Unsecured Notes	Current client on matter unrelated to the Debtors or these Chapter 11 cases
JP Morgan Securities LLC	Unsecured Notes	Current client on matter unrelated to the Debtors or these Chapter 11 cases
JP Morgan Ventures	Contract Counterparties; Interested Parties/ NOA Parties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
JP Morgan Ventures Energy Corporation	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Landmark American Insurance Company	Litigation Counterparties / Litigation Pending Lawsuits	Potential affiliate of former client on matter unrelated to

¹⁴ Milbank believes that Goldman, Sachs & Co. is also referred to in the Debtors' Interested Party List as "Goldman Sachs Bank USA" and "Goldman Sachs."

		the Debtors or the Chapter 11 cases
Lazard Freres & Co. LLC	Debtors Professionals	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Lehman Brothers	Unsecured Notes	Former client on matter unrelated to the Debtors or the Chapter 11 cases
Lehman Brothers Commodity Services	Contract Counterparties	Affiliate of former client on matter unrelated to the Debtors or the Chapter 11 cases
Lexington Insurance Company	Litigation Counterparties / Litigation Pending Lawsuits	Potential affiliate of former client on matter unrelated to the Debtors or the Chapter 11 cases
Liberty Insurance Corporation	Insurance/Insurance Provider/Surety Bonds	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Liberty Insurance Underwriters Inc.	Insurance/Insurance Provider/Surety Bonds	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Liberty Mutual Fire Insurance Company	Insurance/Insurance Provider/Surety Bonds; Litigation Counterparties / Litigation Pending Lawsuits	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Liberty Mutual Insurance Company	Insurance/Insurance Provider/Surety Bonds; Litigation Counterparties / Litigation Pending Lawsuits; Interested Parties/NOA Parties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Liberty Mutual Insurance Europe Limited	Insurance/Insurance Provider/Surety Bonds	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Liberty Mutual Management (Bermuda) Ltd (PDW)	Insurance/Insurance Provider/Surety Bonds	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Liberty Surplus Insurance Company	Insurance/Insurance Provider/Surety Bonds	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases

Liberty Surplus Insurance Corporation	Insurance/Insurance Provider/Surety Bonds	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Life Insurance Company of North America (CIGNA)	Insurance/Insurance Provider/Surety Bonds	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Macquarie Can	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Macquarie Energy LLC	Contract Counterparties; Top Unsecured Creditors; Interested Parties/NOA Parties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Macquarie Futures	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Macquarie Futures LLC	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Magna Carta Insurance Ltd (PDW)	Insurance/Insurance Provider/Surety Bonds	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Mercuria Commodities Canada	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Mercuria Ener Amer Inc.	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Mercury Insurance and certain affiliates	Party Listed on Filed 2019 Statement	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Merrill Lynch	Bank Accounts; Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases

Merrill Lynch Commodities Inc.	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Mitsubishi Electric Power Products, Inc. - Substation Division	Vendors	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Mitsubishi Hitachi Power Systems Americas, Inc.	Vendors	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Mitsubishi UFJ Securities USA, INC.	Bank Accounts	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Mizuho Bank, Ltd. ¹⁵	Term and Revolving Loan Lenders and Administrative Agents; Top Unsecured Creditors; Unsecured Notes; Interested Parties/NOA Parties	Current client on matter unrelated to the Debtors or these Chapter 11 cases
Mojave Solar LLC	Contract Counterparties; Litigation Parties (in adversary); Interested Parties/NOA Parties	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Mojave Sun Power LLC	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Morgan Stanley Bank, N.A. ¹⁶	Bank Accounts; Term and Revolving Loan Lenders and Administrative Agents; Unsecured Notes	Current client on matter unrelated to the Debtors or these Chapter 11 cases
Morgan Stanley Capital Group Inc.	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases

¹⁵ Mizuho,” “Mizuho Corporate Bank” and “Mizuho Bank, Ltd. (TL)

¹⁶ Milbank believes that Morgan Stanley Bank, N.A. is also referred to in the Debtors’ Interested Party List as “Morgan Stanley / ISG Operations.”

Morgan Stanley Senior Funding, Inc.	Term and Revolving Loan Lenders and Administrative Agents; Unsecured Notes	Current client on matter unrelated to the Debtors or these Chapter 11 cases
MUFG Union Bank, N.A. ¹⁷	Term and Revolving Loan Lenders and Administrative Agents; Top Unsecured Creditors	Current client on matter unrelated to the Debtors or these Chapter 11 cases
National Union Fire Insurance Company of Pittsburgh, PA	Litigation Counterparties / Litigation Pending Lawsuits	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Nationwide Mutual Insurance Company	Litigation Counterparties / Litigation Pending Lawsuits	Former client on matter unrelated to the Debtors or these Chapter 11 cases
New Hampshire Insurance Company	Nationwide Mutual Insurance Company	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Noble Americas Corporation	Contract Counterparties	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Noble Americas Energy Solutions LLC	Contract Counterparties	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Noble Americas Gas & Power Corp.	Contract Counterparties	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Nuveen Alternatives Advisors LLC	Party Listed on Filed 2019 Statement	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Oaktree Capital Management LP	Party Listed on Filed 2019 Statement	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Och-Ziff Capital Management Group LLC	Party Listed on Filed 2019 Statement	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Ormat Technologies, Inc.	Contract Counterparties	Former client on matter unrelated to the Debtors or the Chapter 11 cases

¹⁷ Milbank believes that MUFG Union Bank, N.A. is also referred to in the Debtors' Interested Party List as "MUFG."

Pacific Investment Management Company LLC	Party Listed on Filed 2019 Statement	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Pan Pacific (Weber Flat)	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Pattern Energy	Contract Counterparties	Current client on matter unrelated to the Debtors or the Chapter 11 cases
PBF Energy Western Region LLC	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
PricewaterhouseCoopers LLP	Debtors Professionals; Non-Debtors Professionals	Current client on matter unrelated to the Debtors or the Chapter 11 cases
QBE European Operations	Litigation Counterparties / Litigation Pending Lawsuits	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
QBE Insurance Corporation	Litigation Counterparties / Litigation Pending Lawsuits	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
QBE Specialty Insurance Company	Litigation Counterparties / Litigation Pending Lawsuits	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
RBC Capital Markets	Bank Accounts	Current client on matter unrelated to the Debtors or these Chapter 11 cases
RE Astoria LLC	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
RE Gaskell West 3 LLC	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
RE Gaskell West 4 LLC	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
RE Gaskell West 5 LLC	Contract Counterparties	Affiliate of current client on matter unrelated to the

		Debtors or the Chapter 11 cases
RE Kansas LLC	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
RE Kent South LLC	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
RE Old River One LLC	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Recurrent Energy	Contract Counterparties	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Recurrent Energy Development Holdings LLC	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Repsol Canada Energy	Contract Counterparties	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Royal Bank of Canada	Bank Accounts; Term and Revolving Loan Lenders and Administrative Agents; Contract counterparties; Unsecured Notes	Current client on matter unrelated to the Debtors or these Chapter 11 cases
Royal Bank of Scotland, PLC ¹⁸	Bank Accounts; Contract Counterparties; Unsecured Notes	Current client on matter unrelated to the Debtors or these Chapter 11 cases
Schlumberger US Land	Vendors	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Sedgwick	Ordinary Course Professionals	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Shell Energy	Contract Counterparties	Affiliate of current client on matter unrelated to the

¹⁸ Milbank believes that Royal Bank of Scotland, PLC is also referred to in the Debtors' Interested Party List as "RBS."

		Debtors or the Chapter 11 cases
Shell Energy CAN	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Shell Energy North America (US), L.P.	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Shell Energy Trading (US) Company	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Shell Western E & P	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Simpson Trust	Landlords and parties to leases	Potential current client on matter unrelated to the Debtors or the Chapter 11 cases
Smith, Anne Shen	Current Officers and Directors	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Southwest Generation	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
SPS Atwell Island, LLC	Contract Counterparties	Affiliate of former client on matter unrelated to the Debtors or the Chapter 11 cases
Statkraft US LLC	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Sumitomo Mitsui Banking Corporation	Term and Revolving Loan Lenders and Administrative Agents	Current client on matter unrelated to the Debtors or these Chapter 11 cases
SunEdison Yieldco ACQ2, LLC	Contract Counterparties	Affiliate of former client on matter unrelated to the Debtors or the Chapter 11 cases

TATA American International Corp.	Top Unsecured Creditors	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Taconic Capital Advisors LP	Party Listed on Filed 2019 Statement	Current client on matter unrelated to the Debtors or the Chapter 11 cases
TD Bank, N.A.	Term and Revolving Loan Lenders and Administrative Agents; Unsecured Notes	Current client on matter unrelated to the Debtors or these Chapter 11 cases
TD Securities	Unsecured Notes	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
TGP Coyote Canyon, LLC	Contract Counterparties	Potential affiliate of former client on matter unrelated to the Debtors or the Chapter 11 cases
Third Point LLC	Party Listed on Filed 2019 Statement	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
TPG Sixth Street Partners, LLC	Party Listed on Filed 2019 Statement	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Travelers Indemnity Company Of Connecticut ¹⁹	Litigation Counterparties / Litigation Pending Lawsuits	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
UBS AG ²⁰	Unsecured Notes	Current client on matter unrelated to the Debtors or these Chapter 11 cases
UBS Securities	Unsecured Notes	Current client on matter unrelated to the Debtors or these Chapter 11 cases
U.S. Bank N.A. Global Corporate Trust Services	Bank Accounts	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases

¹⁹ Milbank believes that Travelers Indemnity Company Of Connecticut is also referred to in the Debtors' Interested Party List as "Travelers Indemnity of CT."

²⁰ Milbank believes that UBS AG is also referred to in the Debtors' Interested Party List as "UBS Investment Bank."

U.S. Bank, N.A. ²¹	Bank Accounts; Unsecured Notes	Current client on matter unrelated to the Debtors or the Chapter 11 cases
U.S. Bank Equipment Finance	UCC Lien Holders	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Union Bank of California	Bank Accounts	Current client on matter unrelated to the Debtors or these Chapter 11 cases
United Gas & Power	Contract Counterparties	Potential affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
The Vanguard Group	Significant Shareholders (more than 5% of equity); Significant Holder of Voting Security	Current client on matter unrelated to the Debtors or these Chapter 11 cases
Varde Partners, Inc.	Party Listed on Filed 2019 Statement	Current client on matter unrelated to the Debtors or the Chapter 11 cases
Verizon (Airtouch)	Utility Providers	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Verizon Business Network Services	Utility Providers	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Verizon Network Operations	Utility Providers	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Verizon Wireless	Utility Providers	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Verizon Wireless - Network Real Estate C	Utility Providers	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases

²¹ Milbank believes that U.S. Bank, N.A. is also referred to in the Debtors' Interested Party List as "U.S. Bank N.A. Global Corporate Trust Services" and "U.S. Bank, National Association."

Wachovia Corporate Services, Inc.	Bank Accounts	Affiliate of current client on matter unrelated to the Debtors or the Chapter 11 cases
Wartsila North America, Inc.	Vendors	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Wells Fargo LLC	Contract Counterparties	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Wells Fargo Bank, N.A. ²²	Bank Accounts; Term and Revolving Loan Lenders and Administrative Agents; Top Unsecured Creditor; Unsecured Notes; UCC Lien Holders	Current client on matter unrelated to the Debtors or these Chapter 11 cases
Wells Fargo Bank Northwest, National Association, as Trustee Mac: U1228-051	UCC Lien Holders	Affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Wells Fargo Securities, LLC	Bank Accounts; Unsecured Notes	Current client on matter unrelated to the Debtors or these Chapter 11 cases
Willows	Utility Providers	Potential affiliate of current client on matter unrelated to the Debtors or these Chapter 11 cases
Winston & Strawn	Ordinary Course Professionals	Current client on matter unrelated to the Debtors or these Chapter 11 cases

The following individual names appear in Milbank's client database in various capacities. Without further information, it cannot be determined whether these are the same individuals listed in the Debtors' Interested Parties List. Any connections Milbank has with any of these individuals, however, is unrelated to the Debtors or these Chapter 11 Cases:

(i) David R. Andrews [Former Officers and Directors]; (ii) David M. Brown [Landlords]; (iii) Adrian Chavez [Litigation Counterparties / Litigation Pending Lawsuits]; (iv) Richard Fields [Landlord]; (v) Jonathan N. Fishman [Litigation Counterparties / Litigation Pending Lawsuits]; (vi) Nancy Fox [Landlords]; (vii) James Hart [Litigation Counterparties / Litigation Pending Lawsuits]; (viii) Mark Williams [Litigation Counterparties / Litigation Pending Lawsuits];

²² Milbank believes that Wells Fargo Bank, N.A. is also referred to in the Debtors' Interested Party List as "Wells Fargo Bank, National Association" and "Wells Fargo."

Pending Lawsuits]; (ix) Mary and Daniel McMillan [Landlords]; (x) Michael Garcia [Litigation Counterparties / Litigation Pending Lawsuits]; (xi) Michael Graham [Litigation Counterparties / Litigation Pending Lawsuits]; (xii) Mike Williams [Litigation Counterparties / Litigation Pending Lawsuits]; (xiii) Michael Williams [Interested Parties/NOA Parties]; (xiv) Richard Fields [Landlords]; (xv) Robert L. Smith [Landlords]; (xvi) Ron Harris [Litigation Counterparties / Litigation Pending Lawsuits]; (xvii) Steve Wilson [Litigation Counterparties / Litigation Pending Lawsuits]; (xviii) Sue Carlson [Landlords].